



UPPER SANTA CLARA RIVER

Integrated Regional Water Management

Los Angeles County Flood Control District
Castaic Lake Water Agency
City of Santa Clarita
Santa Clarita Valley Sanitation District
Newhall County Water District
Valencia Water Company
Castaic Lake Water Agency, Santa Clarita
Water Division
San Gabriel and Los Angeles Rivers and
Mountains Conservancy

October 16, 2013

Ted Daum, Senior Environmental Scientist
Department of Water Resources
Division of Integrated Regional Water Management
Financial Assistance Branch
P.O. Box 942836
Sacramento, CA 94236-0001

RE: Comments on Addendum to the 2012 IRWM Guidelines, Appendix H, Plan Review Process

Dear Mr. Daum:

Thank you for the opportunity to comment on the Addendum to the 2012 IRWM Guidelines, Appendix H, Plan Review Process. The Addendum provides helpful guidance to IRWM Regions regarding the process for reviewing and evaluating our IRWM Plans. We appreciate the inclusion of the Standards Review Tool Form which details how the content in each section of the Plan will be evaluated. The Upper Santa Clara River IRWM Region respectfully submits the following comments.

Plan Submittal Deadline: The draft Addendum calls for a plan submittal deadline of six (6) months prior to the application due date for future grant solicitations. The application due date for Round Three has not yet been set and it is possible that the due date could be as early as December 2014. This could cause a timing problem for some regions. We recommend that the plan submittal deadline be reduced to no more than three (3) months prior to the grant application due date.

Review Timing: It appears that DWR may start accepting plans for review in December 2013 or January 2014. Some regions, such as the Upper Santa Clara River, will be facing Planning Grant and Implementation Grant deadlines very close together, in the first part of 2014. The timing of DWR's review (up to 60 days – as stated on page 91) requires us to complete our plans sooner than expected for DWR to evaluate and review our plans, make any necessary revisions and complete the adoption phase – and still meet our grant deadlines. The adoption phase can take a long time for regions with many adopting entities. Our goal is to have all our major stakeholders adopt the final plan; this process can take from three to six months to allow all of the entities to schedule adoption on their Board/Commission/Council calendars.

The language regarding how DWR will conduct plan review and what is needed (adopted final plan vs. non-adopted version) is somewhat unclear and does not recognize the constrained timeframe for plan approval. We respectfully request DWR send a confirmation letter acknowledging those IRWM Regions that are making a good faith effort to complete their plans in compliance with its Implementation Grant deadline of two years from the grant agreement execution date. We do not want to default on our grant agreement but are concerned that the timing of the review process may delay our final plan adoption and push our schedule beyond the two-year adoption requirement.

Thank you again for the opportunity to comment. We look forward to working with DWR staff through the review process. For additional clarification and/or comments, please contact Lauren Everett, Water Resources Planner, at (661) 513-1282.

Sincerely,

Dan Masnada
General Manager
Castaic Lake Water Agency

cc: USCR IRWM Plan RWMG